

September 19, 2017

BY ELECTRONIC FILING

Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, DC 20554

Re: *Update to Parts 2 and 25 Concerning Non-Geostationary, Fixed-Satellite Service Systems and Related Matters, IB Docket No. 16-408*

Dear Ms. Dortch:

This is to inform you that, on September 15, 2017, Patricia Cooper and undersigned counsel of Space Exploration Technologies Corp. (“SpaceX”) met Holly Sauer, Acting Legal Advisor to Commissioner Rosenworcel, to discuss the certain aspects of the draft order in the above referenced proceeding on the rules and policies governing non-geostationary satellite orbit (“NGSO”), Fixed-Satellite Service (“FSS”) systems.¹ The presentation and discussion were consistent with SpaceX’s prior meetings on this subject,² in which SpaceX thanked the Commission for moving forward on NGSO issues so diligently, expressed its support for virtually all of the updates to Parts 5 and 25 as adopted in the *Draft R&O*.

We also discussed the basis for SpaceX’s proposal that the Commission add a second topic to the further notice of proposed rulemaking, under which it would propose to define in-line events for uplink transmissions as 25% $\Delta T/T$, which must be satisfied at an angle of no more than 10°. This goes to the very heart of the one issue on which all commenters in this proceeding agree – namely, that the Commission should adopt rules that avoid the need for spectrum splitting if at all possible. Requesting comment on SpaceX’s proposal would allow interested parties to augment the record with respect to an issue already raised in the initial notice of proposed rulemaking that should be addressed for the benefit of all NGSO operators and in furtherance of the Commission’s own commitment to maximizing spectrum efficiency.

¹ See *Update to Parts 2 and 25 Concerning Non-Geostationary, Fixed-Satellite Service Systems and Related Matters*, FCC-CIRC1709-04, public draft Report and Order and Further Notice of Proposed Rulemaking (“*Draft R&O*”), available at <https://www.fcc.gov/document/non-geostationary-satellites-order>.

² See, e.g., Letter from William M. Wiltshire to Marlene H. Dortch, IB Docket No. 16-408 (Sep. 16, 2017) (discussing meeting with Rachael Bender). The materials attached hereto were provided during the meeting.

HARRIS, WILTSHIRE & GRANNIS LLP

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Respectfully submitted,

A handwritten signature in blue ink that reads "William M. Wiltshire". The signature is written in a cursive style with a large, stylized 'W' and 'M'.

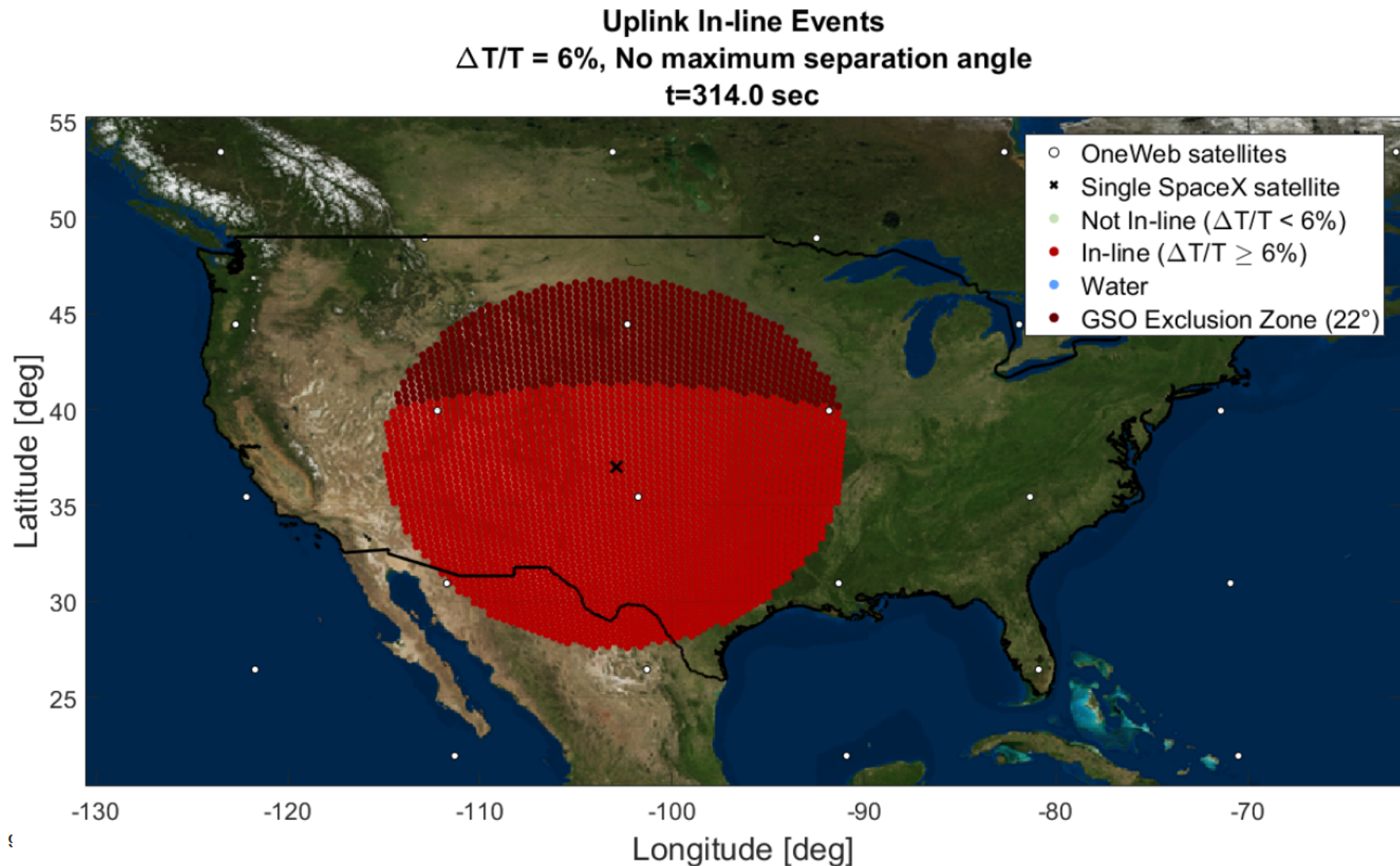
William M. Wiltshire
Counsel to SpaceX

Attachments

cc: Holly Sauer

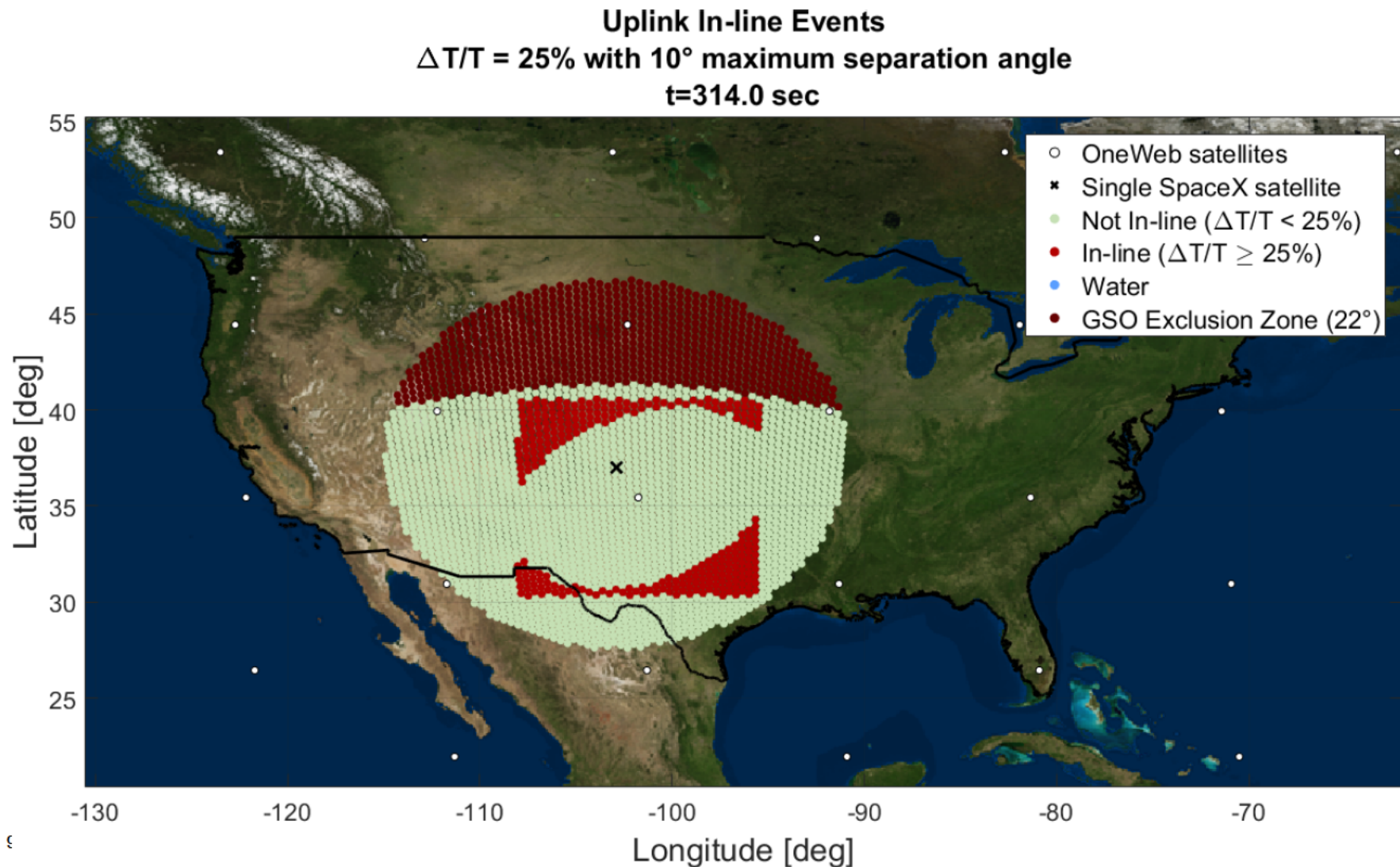
Uplink In-line Events with OneWeb from SpaceX Point of View

$\Delta T/T = 6\%$, no maximum separation angle



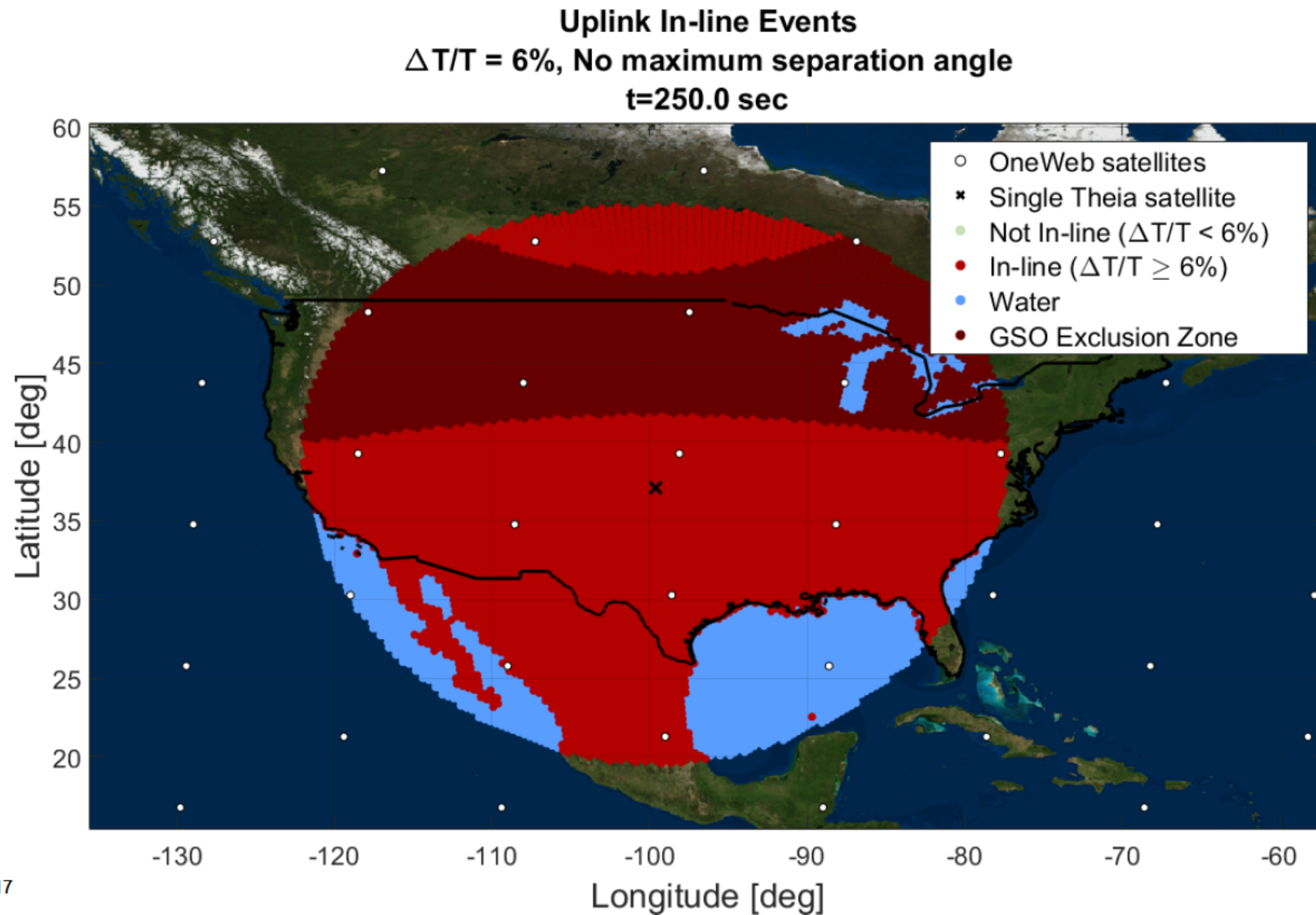
Uplink In-line Events with OneWeb from SpaceX Point of View

$\Delta T/T = 25\%$ with 10° maximum separation angle



Uplink In-line Events with OneWeb from Theia Point of View

$\Delta T/T = 6\%$, no maximum separation angle



Uplink In-line Events with OneWeb from Theia Point of View

$\Delta T/T = 25\%$ with 10° maximum separation angle

